

EXHIBIT B

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

MIROSLAW WIERZBICKI,

Plaintiff,

v.

CITY OF JERSEY CITY;

JERSEY CITY POLICE DEPARTMENT;

And John Does 1-2,

Defendants.

CIVIL ACTION NO.

2:19-cv-17721 (BRM) (SCM)

NOTICE OF MOTION TO DISMISS
PLAINTIFF'S COMPLAINT IN LIEU
OF ANSWER PURSUANT TO
FED. R. CIV. P. 12(B) (6)
AND 8(A)

TO: The Hon. Brian R. Martinotti, U.S.D.J.
United States District Court - District of New Jersey
Martin Luther King Building
& U.S. Courthouse
50 Walnut Street
Newark, NJ 07102

Livius M. Ilasz, Esq.
Ilasz & Associates
1035 Route 46 East, Suite 105
Clifton, New Jersey 07013
Counsel for Plaintiff

PLEASE TAKE NOTICE that in lieu of filing an answer to the plaintiff's complaint, on November 18, 2019, the undersigned, Brittany M. Murray, Assistant Corporation Counsel for the City of Jersey City, counsel for the Defendants, City of Jersey City and the Jersey City Police Department (collectively the "Defendants") shall move before the Honorable Brian R. Martinotti, U.S.D.J., in the United States District Court, Newark, New Jersey, pursuant to Fed. R. Civ. P. 12(b)(6) and 8(a) for an Order dismissing the